

ORIGINAL

AUSA: William C. Kinder

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UNITED STATES OF AMERICA

v.

ALBERT MUJAJ,

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 1343, 1344,
1028A and 2

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

JACOB SIMKOVITZ, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE
(Bank Fraud)

1. From at least in or about July 2022 through at least in or about August 2022, in the Southern District of New York and elsewhere, ALBERT MUJAJ, the defendant, knowingly executed, and attempted to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations and promises, to wit, MUJAJ engaged in a scheme to obtain, by means of false and fraudulent pretenses, representations, and documents, funds from a stolen check deposited into a bank account with a financial institution.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT TWO
(Wire Fraud)

2. From at least in or about July 2022 through at least in or about at least August 2022, in the Southern District of New York and elsewhere, ALBERT MUJAJ, the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, which affected a financial institution, to wit, MUJAJ engaged in a scheme to obtain funds from a stolen check deposited into a bank account with a financial institution and made and aided and abetted the making of electronic payments in furtherance of that scheme.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT THREE
(Aggravated Identity Theft)

3. From at least in or about July 2022 through at least in or about August 2022, in the Southern District of New York and elsewhere, ALBERT MUJAJ, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, MUJAJ used and transferred the name, address and other personal information of a victim during and in relation to the bank fraud charged in Count One of this Complaint and the wire fraud charged in Count Two of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a Postal Inspector with the USPIS. This affidavit is based upon my conversations with witnesses and other law enforcement personnel, my review of video footage, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

A Stolen Check for \$118,750 is Deposited into a Fraudulently Opened Bank Account

5. Based on my personal involvement in this investigation, my review of reports and records, and discussions I have had with witnesses and other law enforcement personnel, I have learned the following.

a. Since in or about August 2022, the USPIS has been investigating the theft of mail sent to an address in Yonkers, New York. Specifically, USPIS has been investigating the theft of a check for \$118,750 sent by an insurance company ("Insurance Company-1") on July 19, 2022, to an individual ("Victim-1").

b. Based on my review of reports and records and discussions with witnesses, I know that on or about August 22, 2022, Victim-1 reported to USPIS that a check mailed to him by Insurance Company-1 had been stolen (the "Stolen Check").

c. Based on my review of reports and records, surveillance video, and discussions with witnesses, I know that on or about August 3, 2022, an individual opened three bank accounts (the "Bank Accounts") at the Ridgewood, New Jersey branch of a particular financial institution ("Bank-1"). To open the Bank Accounts, the individual was required to present two forms of identification. The individual presented two forms of identification showing Victim-1's name, including a bank card and a New York driver's license with the name and personal information of Victim-1. The individual also funded one of the Bank Accounts ("Bank Account-1") with a required minimum deposit of \$25.

d. Based on my review of surveillance video from Bank-1, my personal

observations of Victim-1, and my conversations with witnesses, I know that the individual who opened the Bank Accounts was not Victim-1.

e. Based on my review of surveillance video from Bank-1, I know that on or about August 5, 2022, the same individual who opened the Bank Accounts entered the same branch of Bank-1 and deposited the Stolen Check into one of the Bank Accounts ("Bank Account-1").

i. Based on my review of records and conversations with witnesses, I know that the Stolen Check was for \$118,750 and was issued by Insurance Company-1 to Victim-1, at a particular address on Main Street in Yonkers, New York 10701. I further know that the proceeds of the check were transferred to Bank Account-1 from Insurance Company-1's financial institution.

ii. Based on my review of surveillance video from Bank-1, the individual who deposited the Stolen Check on or about August 5, 2022 wore a short-sleeve navy blue collared shirt with white buttons and distinctive white insignia, and a watch with a black face and brown band.

Identification of ALBERT MUJAJ as the Individual Who Opened the Bank Accounts and Deposited the Stolen Check

6. Based on my review of reports and records, including surveillance video from Bank-1, law enforcement reports, and media posted on the Instagram account of ALBERT MUJAJ, the defendant, I have concluded that the individual who opened the Bank Accounts and deposited the Stolen Check is MUJAJ. The bases for this conclusion include the following:

a. Surveillance video of the individual who opened the Bank Accounts and deposited the Stolen Check matches known law enforcement photographs of MUJAJ. Still images from surveillance video of the individual who opened the Bank Accounts and deposited the Stolen Check are below (left and middle), alongside a known law enforcement photograph of MUJAJ (right).

Individual who opened the Bank Accounts



Individual who deposited the Stolen Check



ALBERT MUJAJ, the defendant



b. In addition, based on my review of subscriber records, I know that MUJAJ uses an Instagram account with the handle "@xxal2rgcke." The account identifies the user as

“Albert Mujaj” and contains numerous pictures of MUJAJ. Those pictures match the appearance of the individual who opened the Bank Accounts and deposited the Stolen Check. An image of MUJAJ’s Instagram profile page is shown below. The profile page depicts MUJAJ’s face, lists his Instagram handle (“xxal2rgcke”), states that his name is “Albert Mujaj,” and indicates that he is a “banker.”



c. Based on my review of MUJAJ’s Instagram account, I know that on July 21 and July 22, 2022, MUJAJ posted videos of himself wearing a shirt and watch that match those worn by the individual who deposited the Stolen Check on August 5, 2022.

i. Instagram videos posted by MUJAJ on July 21 and July 22, 2022 depict him wearing a short-sleeve navy blue collared shirt with white buttons and distinctive white floral insignia. As can be seen from the shirt’s color, buttons, and placement of the white insignia, MUJAJ’s Instagram post depicts the same shirt worn by the individual who deposited the Stolen Check. In particular, the distinctive white floral insignia shown in MUJAJ’s Instagram videos appear in the same locations as the white insignia on the shirt of the individual who deposited the Stolen Check.

1. For example, in the image from Bank-1 surveillance video below to the left, a white insignia appears on the left side of the chest of the individual who deposited the Stolen Check, adjacent to the space between the third and fourth white buttons from the top of the shirt. In the image from MUJAJ’s Instagram account below to the right, a similarly shaped white floral insignia appears in the exact same location.¹

¹ The videos from MUJAJ’s Instagram account appear to have been created using “selfie” mode, where the camera depicts the user of the phone in mirror-image format. Because of their mirror-image nature, the Instagram videos depict the white insignia on opposite sides from where they are seen in the surveillance video from Bank-1. Thus, in the image from the Instagram video shown here, the white insignia appears on the right side of MUJAJ’s shirt, but it is actually on the left side of the shirt.

Individual who deposited the Stolen Check



MUJAJ Instagram video posted on July 21, 2022



2. In addition, in the image from Bank-1 surveillance video below to the left, two white insignia appear on the right shoulder of the individual who deposited the Stolen Check, adjacent to the shirt's shoulder seam. In the image from MUJAJ's Instagram account below to the right, two similarly shaped white floral insignia appear in the exact same location.²

Individual who deposited the Stolen Check



MUJAJ Instagram video posted on July 22, 2022



² Because of the mirror image-nature of the Instagram videos described *supra*, the white floral insignia on MUJAJ's shirt shown in the Instagram image are actually on the right side of the shirt.

ii. Further, the surveillance video from Bank-1 of the individual who deposited the Stolen Check depicts him wearing a watch with a black face and brown band on his left arm (below left). The July 21, 2022 video on MUJAJ's Instagram account shows MUJAJ wearing a matching watch on the same arm (below right).³

Individual who deposited the Stolen Check MUJAJ Instagram video posted on July 21, 2022



MUJAJ Completes the Fraud

7. Based on my review of reports and records, including bank account statements and postal records, as well as my discussions with witnesses, I have learned the following:

a. On August 7, 2022, an online change-of-address form for Victim-1 was submitted to the United States Postal Service. The change-of-address form indicated that Victim-1 sought to change his address from his home in Brooklyn, New York, to 782 Pelham Parkway S, Apartment B5, in the Bronx, New York (the "Pelham Parkway Address"). The Pelham Parkway Address is located less than one block from law enforcement's last known address for ALBERT MUJAJ, the defendant, of 2164 Barnes Avenue in the Bronx, New York.

b. Based on my discussions with Victim-1, I know that Victim-1 did not submit an online change-of-address form on August 7, 2022. Further, I know that Victim-1 still resides at the address in Brooklyn, and he does not reside or receive mail in the Bronx.

c. Based on my review of records, including account statements and electronic payment platform records, I have learned that the following debits were made from Bank Account-1 after it had been opened in Victim-1's name.

i. On or about August 4, 2022, an electronic transfer of \$10 was made from Bank Account-1 to "Alexander Zapata" using the digital payment platform Zelle. Based on my review of GPS location data for the phone number associated with the Zelle account that initiated the transfer, I know that the payment was initiated from Manhattan, New York.

³ Once again, because of the mirror image-nature of the Instagram videos described *supra*, the watch depicted in the image from the Instagram video was on MUJAJ's left arm.

ii. On or about August 8, 2022, a debit card purchase of \$1.10 was made from Bank Account-1 for a change of address with the United States Postal Service.

iii. On or about August 12, 2022, an electronic transfer of \$1,000 was made from Bank Account-1 to "Alexander Zapata," using the digital payment platform Zelle.

iv. On or about August 16, 2022, a debit card purchase of \$1,000 was made from Bank Account-1 for Apple Cash.

v. On or about August 16, 2022, a debit card purchase of \$998 was made from Bank Account-1 for Apple Cash.

d. Based on my review of Bank Account-1 records, I know that no debits were made from Bank Account-1 after August 16, 2022. Based on my review of records and conversations with witnesses, I know that in or about September 2022, Bank-1 returned the full amount of proceeds from the Stolen Check to Insurance Company-1's financial institution.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of ALBERT MUJAJ, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.

s/ Jacob Simkovitz /otw

JACOB SIMKOVITZ

Postal Inspector

USPIS

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this ____ day of September, 2023.



THE HONORABLE ONA T. WANG

United States Magistrate Judge

Southern District of New York